Form M-100

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	**Case No.**
	§	**(Chapter __)**

MOTION FOR ENTRY OF AGREED ORDER CONDITIONING AUTOMATIC STAY [AND CO-DEBTOR STAY] REGARDING EXEMPT PROPERTY

THIS IS A MOTION FOR ENTRY OF AN AGREED ORDER CONDITIONING THE AUTOMATIC STAY. IF YOU OBJECT TO THE GRANTING OF RELIEF, YOU SHOULD CONTACT THE MOVANT IMMEDIATELY TO TRY TO REACH AN AGREEMENT. IF YOU CANNOT REACH AN AGREEMENT, YOU MUST FILE A WRITTEN RESPONSE AND SEND A COPY TO MOVANT WITHIN 15 DAYS OF THE DATE THIS WAS MAILED TO YOU. IF NO TIMELY OPPOSITION IS FILED, THE COURT MAY GRANT THE RELIEF WITHOUT A HEARING.

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1. Movant: _____

2. Movant, directly or as agent for the holder, holds a security interest in [describe property. If real property, must list street address and legal description.]

3. The Debtor's exemptions _____ have _____ have not been allowed.

4. Type of collateral (e.g., Home, Manufactured Home, Car, Truck, Motorcycle): _____

5. Debtor's scheduled value of property: $_____.

6. Movant's estimated value of property: $_____.

7. Total amount owed to movant: $_____.

8. Estimated equity (paragraph 6 minus paragraph 7): $_____.

9. Total pre and post-petition arrearages: $_____.

10. Total post-petition arrearages: $_____.

11. Amount of unpaid, past due property taxes, if applicable: $_____.

12. Expiration date on insurance policy, if applicable: _____.

13. Movant and Debtor [and co-debtor, if applicable] have agreed to condition the automatic stay pursuant to the terms of the attached agreed order. Accordingly, the parties request entry of the agreed order.

Date: _____

_____
Movant's counsel signature
Name: _____
State Bar No.: _____
S.D. Tex. Bar No.: _____
Address: _____
_____
Telephone: _____
Fax: _____
E-mail: _____

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Certificate of Service and Certificate of Compliance with BLR 4001

A copy of this motion was served on the persons shown on exhibit "1" at the addresses reflected on that exhibit on [date] by prepaid United States first class mail. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.

_____
Movant's counsel